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CONFIDENTIAL

Environmental Protection Agency
Alaska Operations Office

0701
4a

RCRA Compliance Evaluation Inspection Report

Facility Name: **MAPCO Alaska Petroleum Inc.**

Facility Location: **North Pole, Alaska**

Facility EPA ID#: **AKD 00064 3239** 0701

Company Representatives: **Kathleen McCullom**
Environmental Coordinator

MAPCO Alaska Petroleum Inc.
P1100 H&H Lane
North Pole, Alaska 99705

(907) 488-2741

Date of Inspection: **June 25, 1992**

EPA Inspectors: **Kurt A. Eilo**
Hazardous Waste Enforcement Coordinator
U.S. EPA - Alaska Operations Office
222 West 7th Avenue, Box 19
Anchorage, Alaska 99713-7588

K A Eilo
6/29/92

(907) 271-5083

State Inspectors: **Kristen DuBois-Goodwin**
Alaska Department of Environmental
Conservation
Northern Regional Office
1001 Noble Street, Suite 350
Fairbanks, Alaska 99701

(907) 451-2360

FILE COPY

I. Facility Description:

MAPCO Alaska Petroleum Inc. generates hazardous waste as a result of their petroleum refinery activities. MAPCO is pursuing clean closure of several units and treating petroleum contaminated groundwater as part of the 3008(a) Complaint and Compliance Order and a 3008(h) Administrative Order on Consent both signed on January 6, 1989 (3008(h) was effective January 11, 1989).

II. Site Inspection:

The following MAPCO facilities were visited as part of this RCRA compliance evaluation inspection:

1. Control Room
2. Desalter #1
3. Effluent Building
4. Process Air Strippers
5. Sump 905(b)
6. Wastewater Lagoons
7. Hazardous Waste Storage Area
8. Laboratory
9. Fire Training Pit
10. Oily Gravel Concrete Pad

III. Potential Violations:

1. *40 C.F.R. § 265.142(b) requires during the active life of the facility, the owner or operator must adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with § 265.143. For owners and operators using the financial test or corporate guarantee, the closure cost estimate must be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Regional Administrator as specified in § 265.143(e)(3) [citation continues].*

Evidence:

EPA established that MAPCO operated as a facility without obtaining interim status or a RCRA Permit during a March 1987 inspection. The January 6, 1989, 3008(a) Consent Order, Section II, Findings of Fact, item 13, resolves an EPA 3008(a) Complaint and Compliance Order which alleges that MAPCO violated provisions of § 3005 and § 3010 of RCRA and the regulations adopted pursuant to the act in 40 CFR 270 and that the Respondent had operated a hazardous waste storage facility

and/or had disposed of hazardous waste without interim status or a permit. Item 13-h of the Consent Order resolves allegations in the Complaint that the facility operated a hazardous waste storage and/or disposal facility without estimating closure cost, without providing financial assurance for the closure of the facility, and without demonstrating financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operation of the facility, as required by 40 CFR 265.142, 265.143, and 265.147.

Section V - Final Order, item 2, page 11 of 15, of the January 6, 1989 3008(a) compliance order specified that MAPCO shall, within 60 days of the effective date of this Order, for the waste storage area, Tank 192, applicable facility sumps, and the surface impoundment accomplish the following: [item a,b,c excluded here] d. demonstrate the facility's compliance with the applicable financial requirements of 40 CFR §§ 265.142, and 165.143.

MAPCO only once provided demonstration of financial assurance through a corporate guarantee as an attachment to the 3008(h) Consent Order signed January 6, 1988.

Kathleen McCullom explained that she understood their obligation to comply with 40 C.F.R. § 265, Subpart H, was to be a one-time requirement under the 3008(a) agreement. She further explained that as a result they had not revised the closure cost estimates or submitted updated financial assurance information to the Regional Administrator. In addition, EPA Region 10 files do not contain any MAPCO submittal of an annual revision of the closure cost estimates or the corporate guarantee.

IV. Other:

1. In October 1991, MAPCO submitted a closure certification to demonstrate compliance with the closure requirement for units addressed in the 3008(a) Order and the approved closure plans. EPA has not yet provided comments or approval on the closure certification.

VIII. Photograph Log:

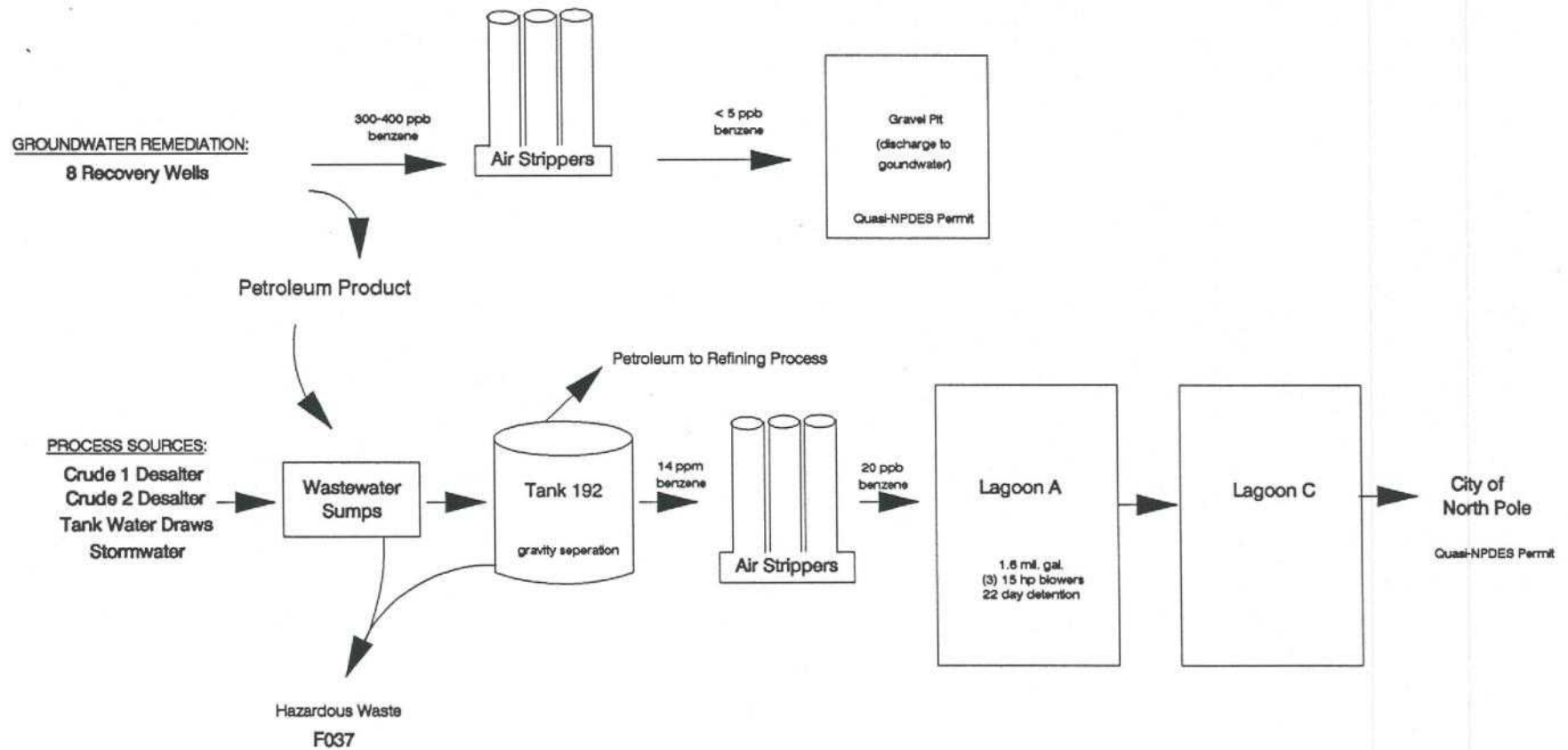
- Photo #1: Tank 192 - gravity separation of wastewaters and petroleum product
- Photo #2: "
- Photo #3: Process wastewater air stripper at effluent building
- Photo #4: Lagoon A
- Photo #5: Lagoon A
- Photo #6: Sump 905(b) - a 3008(a) closure unit
- Photo #7: Hazardous Waste Storage Area
- Photo #8: Fire Training Pit
- Photo #9: "Gravel Pit" - receives wastewater from groundwater remediation process
- Photo #10: "
- Photo #11: Cleaned out heat exchangers at gravel storage pad
- Photo #12: "
- Photo #13: 9 drums of D018 waste dated 5/15/92 - each 3/4 full, 1 drum K050 dated 12/19/91
- Photo #14: < 90 day hazardous waste storage area at laboratory

ATTACHMENTS

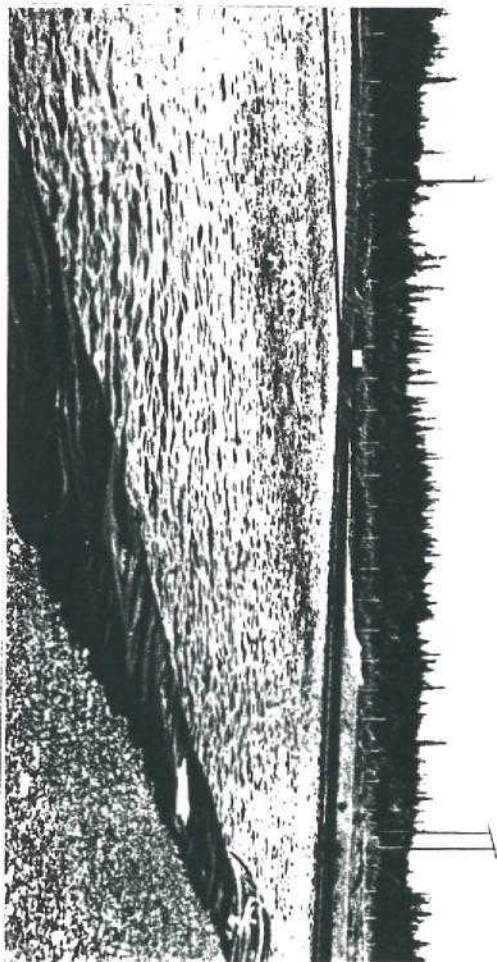
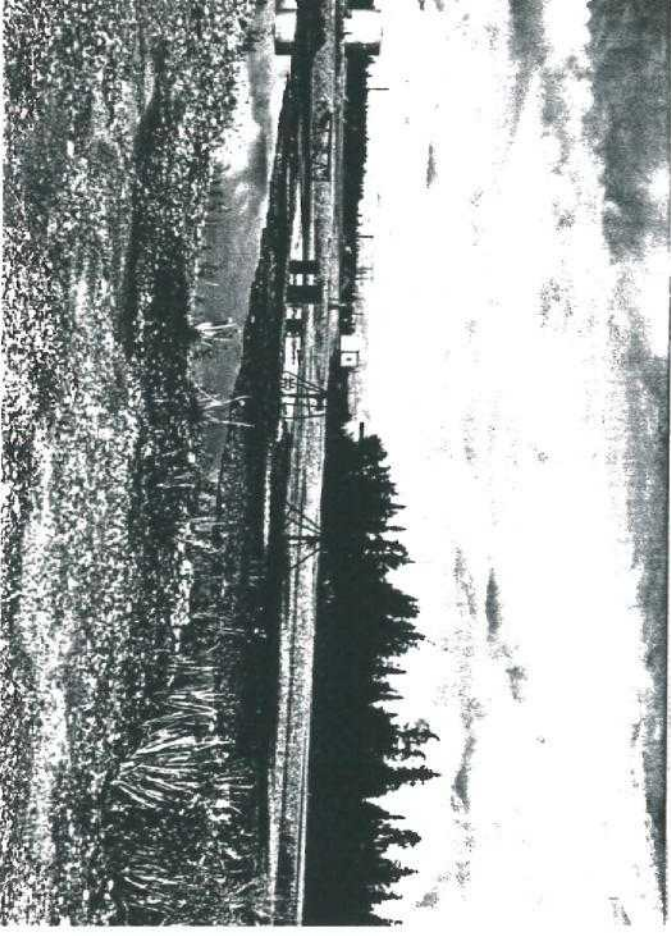
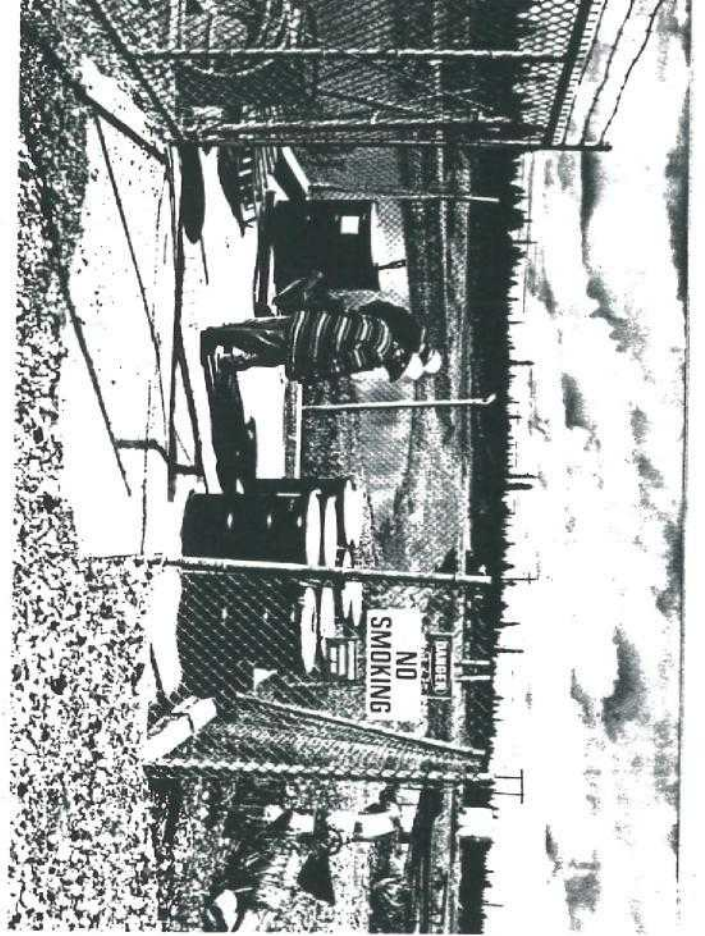
- Attachment 1 - Groundwater Remediation and Process Wastewater Treatment diagram
- Attachment 2 - ADEC Wastewater Disposal Permit
- Attachment 3 - Documents requested during inspection

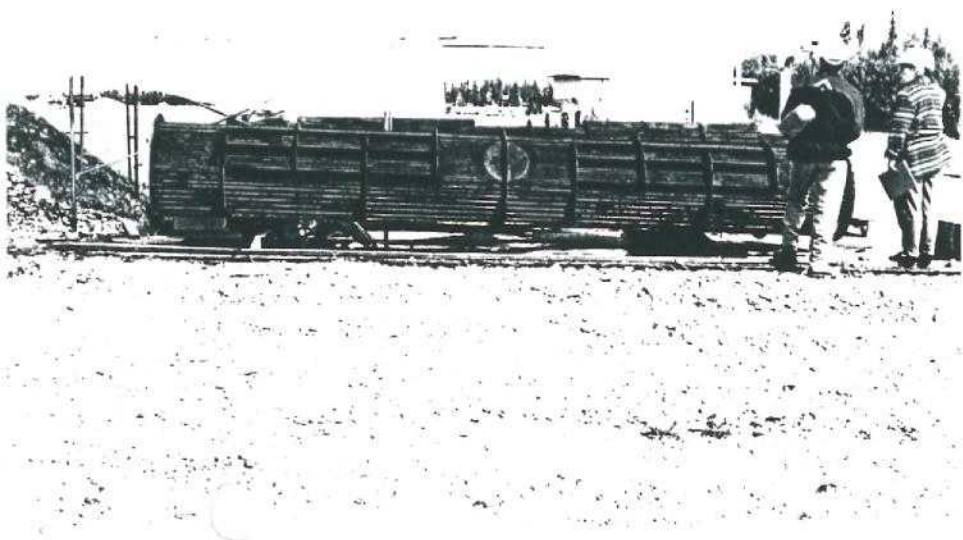
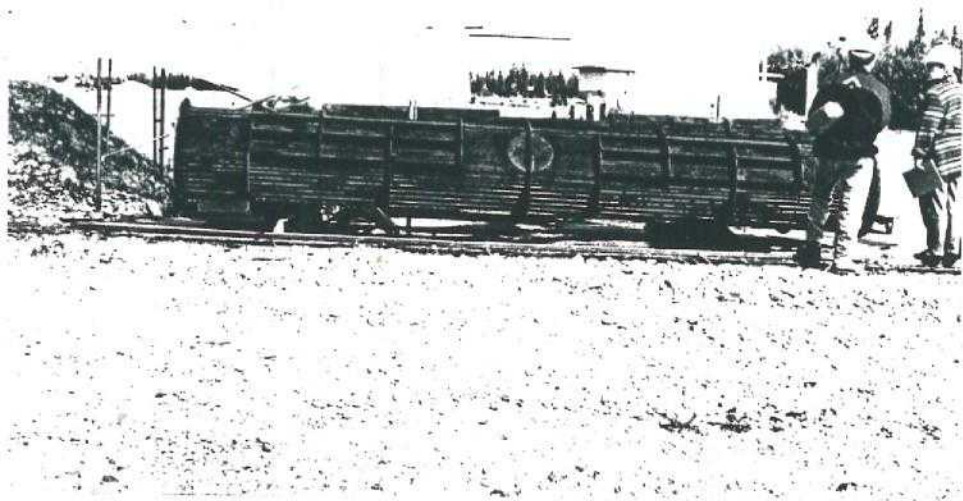
1

MAPCO Alaska Petroleum Inc Groundwater Remediation and Process Wastewater Treatment



2





DEPT. OF ENVIRONMENTAL CONSERVATION

(907) 452-1714

June 29, 1990

Northern Regional Office
1001 Noble Street
Suite 350
Fairbanks, Alaska 99701

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

Mr. D. C. Rowse
Manager of Engineering
MAPCO Alaska Petroleum, Inc.
North Pole, AK 99705

Dear Mr. Rowse:

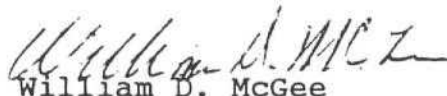
Re: Wastewater Disposal Permit
Number 9031-DB002, Mapco Petroleum Company

The Department of Environmental Conservation has completed its review of your applications and is issuing Wastewater Disposal Permit 9031-DB002.

Any person who disagrees with this decision may appeal the decision by requesting an adjudicatory hearing, using the procedures contained in 18 AAC 15.200-310. Hearing requests must be delivered to the Commissioner of the Department of Environmental Conservation, 3220 Hospital Drive, P.O. Box 0, Juneau, Alaska 99811-1800, within 30 days of receipt of this letter. If a hearing is not requested within 30 days, the right to appeal is waived and the decision becomes final.

Please be reminded that you must submit renewal notices 30 days in advance of the expiration date of the permit (Appendix B, section VII).

Sincerely,



William D. McGee
Regional Environmental Supervisor

wdm/rg

Enclosures: Permit Number 9031-DB002

cc:

Larry Dietrick, ADEC/Juneau
Doug Dasher, ADEC/Fairbanks
Randell Weiner, TFA/Anchorage
100.45.009

STATE OF ALASKA
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
NORTHERN REGIONAL OFFICE
1001 NOBLE STREET, SUITE 350
FAIRBANKS, ALASKA 99701

WASTEWATER DISPOSAL PERMIT

Permit No.: 9031-DB002

Date: June 29, 1990

This Waste Disposal Permit is issued to MAPCO Alaska Petroleum, Inc., 1100 H&H Lane, North Pole, Alaska 99705, for the disposal of treated non-domestic wastewater from the air stripping facility at the Mapco North Pole Refinery, 1100 H&H Lane North Pole, Alaska. The discharge receiving waters are a gravel pit located near the stripping facility Section 16, T.1S., R.2E., Fairbanks Meridian. This permit is subject to the conditions and stipulations contained in Appendices A and B, which are incorporated herein by reference.

This permit is issued under provisions of Alaska Statute 46.03, the Alaska Administrative Code, as amended or revised, and other applicable state laws and regulations, including standards of the Alaska Coastal Management Program under 6 AAC 80.

This permit is effective upon issuance and expires July 1, 1995. It may be terminated, modified, or renewed in accordance with AS 46.03.120.



William D. McGee
Regional Environmental Supervisor

APPENDIX A - SPECIFIC PERMIT CONDITIONS

I. EFFLUENT LIMITATIONS

- A. During the period beginning on the effective date of this permit and lasting through the expiration or termination date, the permittee is authorized to discharge treated non-domestic wastewater as specified in this section.
- B. The treated non-domestic wastewater discharged to the lands or waters of the state shall not exceed the following limitations:

<u>Effluent Characteristic</u>	<u>Daily Average</u>	<u>Maximum Value</u>
Flow, MGD	Report	Report
Benzene	5.0 ug\l*	5.0 ug\l*
Total BETX	100 ug\l*	100 ug\l*

*micrograms per liter (ug/l)

BETX shall be measured as the sum of benzene, ethylbenzene, toluene, and xylenes.

- C. The pH of the effluent shall be between 6.0 and 8.5 pH units or within 0.5 unit of the pH of the receiving water at all times.
- D. There shall be no discharge of floating solids, garbage, grease, foam, or oily waste which produce a sheen on the surface of receiving waters.
- E. The discharge shall not cause a violation of the State Water Quality Standards (18 AAC 70).
- F. No other treated or untreated wastewater, sludge, or other materials shall be discharged to the lands or waters of the state unless otherwise approved in writing by the department.

II. MONITORING AND REPORTING

A. Monitoring of Effluent

The permittee shall monitor the wastewater stream in the following manner and frequency while the discharge is occurring:

<u>Wastewater Stream Segment</u>	<u>Characteristic</u>	<u>Minimum Frequency</u>	<u>Sample Type</u>
Influent and Effluent	Total flow	Five each week	Meter
	Benzene	Once every month	Grab
	Total BETX	Once every month	Grab

1. Benzene, ethylbenzene each xylene isomer and toluene,, shall be separately quantified. Benzene and the BETX shall be reported The EPA Method 602 - Purgeable Aromatics - shall be used as outlined in 40 CFR 136.
2. Influent and effluent samples for BETX shall be taken on the same day.

B. Groundwater Monitoring

1. The permittee shall submit a plan to monitor the groundwater downgradient from the gravel pit to the department by December 1, 1990. The plan shall include the direction of groundwater flow and the number and location of monitoring wells necessary to accomplish this. The sampling plan must address sampling methods and techniques and monitoring well construction. A quality assurance-quality control plan must be included in the submittal.

Upon department approval of the sampling plan, the permittee shall collect representative samples from the receiving groundwater downgradient from the gravel pit each month for the first twelve (12) months following approval of the sampling plan. The samples must be analyzed for Benzene and BETX. The department, in its sole discretion, may relax the sampling frequency from monthly to quarterly depending upon the initial 12 monthly sample results. The department, in its sole discretion, may require additional groundwater monitoring including the installation of additional monitoring wells if the results of the groundwater monitoring so indicate.

C. Test Procedures

Test procedures for the analysis of pollutants shall conform to methods cited in 18 AAC 70.020(c), or as such regulations may be amended. The permittee may substitute alternative methods of monitoring or analysis upon receipt of prior written approval from the department.

D. Representative Sampling

Samples and measurements taken as required shall be representative of the volume and nature of the monitored discharge. The permittee shall submit within 30 days of the effective date of this permit, a brief description of monitoring methods, including, but not limited to, commercial laboratories to be used, sampling methods, in situ analytical methods, equipment to be used, and location of sampling and measurement points.

F. Additional Monitoring

If the permittee monitors any influent or effluent characteristic identified in this permit more frequently than required, the results of such monitoring shall be reported to the department in the monthly monitoring report required under Appendix A, paragraph III of this permit.

III. REPORTING

Monitoring results obtained during each reporting period shall be summarized and reported to the department and postmarked no later than the 14th day of the month following the completed reporting period. Reporting shall begin at the commencement of discharge. Signed copies of these, and all other reports required herein, shall be submitted to the department at the following address:

State of Alaska
Department of Environmental Conservation
1001 Noble Street, Suite 350
Fairbanks, Alaska 99701

Phone: (907) 452-1714

Knowingly making a false statement, by the permittee, the operator or other employees, including contractors, on any such report may result in the imposition of criminal penalties as provided for under AS 46.03.790.

IV. RECORDS RETENTION

All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed, and calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation, shall be retained in Alaska for observation by the department for three years. Upon request from the department, the permittee shall submit certified copies of such records.

V. CHANGE IN DISCHARGE

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant or toxic material (including oil, grease, or solvents) more frequently than, or at a concentration or limit not authorized, shall constitute noncompliance with the permit. Any anticipated facility expansions, flow increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new waste disposal permit application, or if such changes will not violate the effluent limitations specified in this permit, by written notice to the department at the address specified in Appendix A, paragraph III at least 30 days before the implementation of such changes. Physical changes may also be subject to plan review by the department.

VI. TOXIC POLLUTANTS

If a toxic pollutant (including oil, grease, or solvents) concentration standard is established in accordance with 18 AAC 70 for a pollutant present in this discharge, and such standard is more stringent than the limitation in this permit, this permit may be modified in accordance with the toxic pollutant concentration standard.

VII. ACCIDENTAL DISCHARGES

The permittee shall provide protection from accidental discharges not in compliance with the provisions of this permit. Facilities to prevent such discharges shall be maintained in good working condition at all times by the permittee.

VIII. NONCOMPLIANCE NOTIFICATION

- A. If, for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit, the permittee shall report the noncompliance to the department within 24 hours, or as soon thereafter as possible, of becoming aware of such conditions.

- B. A written follow-up report shall be sent to the department within seven days of the noncompliance event. The written report shall contain but not be limited to:
1. Times and dates on which the event occurred and, if not corrected, the anticipated time the noncompliance is expected to continue.
 2. A detailed description of the event, including quantities and types of materials involved.
 3. Details of any actual or potential impact on the receiving environment or public health.
 4. Details of actions taken or to be taken to correct the causes of the event.
 5. Details of actions taken or to be taken to correct any damage resulting from the event.
- C. It is recognized that influent quality changes, equipment malfunctions, or uncontrollable circumstances may sometimes result in effluent concentrations exceeding the permit limitations, despite the exercise of all possible care and maintenance measures and corrective measures by the permittee. The permittee may demonstrate to the department that such circumstances did exist where, despite all evasive measures, the effluent concentrations exceeded those set forth in this permit. The Commissioner shall consider such evidence in determining departmental actions. The department does not waive any of its legal rights during such consideration.

IX. TRANSFER OF OWNERSHIP

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Environmental Supervisor of the Department of Environmental Conservation at the address in Appendix A, paragraph III of this permit.

APPENDIX B - GENERAL PERMIT CONDITIONS

I. ACCESS AND INSPECTION

The permittee shall allow the Commissioner or his representative access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, state laws, and regulations.

II. INFORMATION ACCESS

Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska Department of Environmental Conservation, Northern Regional Office, 1001 Noble Street, Suite 350, Fairbanks, Alaska 99701.

III. CIVIL AND CRIMINAL LIABILITY

Nothing in this permit shall relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.

IV. AVAILABILITY

The permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

V. ADVERSE IMPACT

The permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The permittee shall cleanup and restore all areas adversely impacted by the noncompliance.

VI. CULTURAL OR PALEONTOLOGICAL RESOURCES

Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907/762-2622).

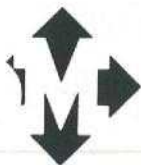
VII. APPLICATIONS FOR RENEWAL

In accordance with 18 AAC 15.100(d), applications for renewal or amendment of this permit must be made no later than 30 days before the expiration date of the permit or the planned effective date of the amendment.

VIII. OTHER LEGAL OBLIGATIONS

The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the permittee. This permit does not relieve the permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the permittee pursuant to the terms of this permit and all plans implemented by the permittee pursuant to the terms of this permit shall comply with all applicable federal and state laws and regulations.

3



CO-036
MAPCO ALASKA PETROLEUM INC.

1100 H&H LANE
NORTH POLE, ALASKA 99705
(907) 488-2741

RECEIVED

JUL 10 1992

ANCHORAGE-A00/A

July 7, 1992

Mr. Kurt Eilo
Environmental Protection Agency
222 West 7th Ave. Box 19
Anchorage, Ak 99513

Re: 1992 RCRA Inspection

Dear Mr. Eilo,

On June 25, 1992 you conducted a RCRA Hazardous Waste Inspection of MAPCO ALASKA PETROLEUM Inc.'s North Pole Refinery. During the final meeting you requested the following items:

- ♦ Documentation of my training.
- ♦ Hazardous Waste Manifest NPR10.
- ♦ Emergency Preparedness Plan.
- ♦ Horsepower description for Lagoons.
- ♦ BTEX analysis of Lagoon A influent.

These items are attached. The Emergency preparedness plan is pages 9 and 10 in a document titled "Procedures and Methods to Assure Compliance with 40 CFR 262 Regulations". This document was submitted in accordance with the Consent Agreement and Final Order on January 31, 1989.

If you have any questions or comments concerning the following attachments please call me at 488-0033.

Sincerely,

Kathleen McCullom
Environmental Coordinator
MAPCO ALASKA PETROLEUM Inc.

KM:Bel

Attachments

cc: G.E. Fritz w/o Attachments
D.C. Rowse w/o Attachments

MAPCO ALASKA PETROLEUM Inc.
North Pole Refinery

RECEIVED

JUL 10 1992

Lagoon A
High rate Aeration Specs

ANCHORAGE-A00/A

3 - 15 hp Sutorbilt blowers service 3 lagoons with a combined capacity that does not not exceed 6 million gallons.

Process Wastewater Flow = 50 gpm

Lagoon A Volume = 1,600,000 gallons

Detention time = 22 days

Lagoon A
Influent Concentration (ppb)

Date	Benzene	Toluene	E-Benzene	Xylene
06/18/91	65	85	7	57
07/09/91	30	37	2	22
08/07/91	10	23	<0.5	35
09/04/91	16	35	<0.5	21
10/01/91	6.6	14.5	<0.5	1.7
11/05/91	<0.5	1.4	<0.5	5.5
12/03/91	36	52	<0.5	110
01/28/92	15	19	<0.5	51
02/25/92	27	39	18	180
03/25/92	3.2	2.1	1.1	8.5
04/21/92	21	23	3.6	40
5/19/92	47	58	5.6	130

CHEMICAL PROCESSORS, INC./RESOURCE RECOVERY CORP.

2203 Air
Chempro (206) 223-0500

Way So., Suite 400 • Seattle, WA 98134

Resource Recovery (206) 1900
WAD061672812

Form Approved. OMB No. 2050-0039. Expires 9-30-91

lease print or type
orm designed for use on elite (12-pitch) typewriter.)

INIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.
AKD00850701

Manifest
Document No.
NPR10

2. Page 1
1 of 2

Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

MapCo Alaska Petroleum Inc. 1100 H & H Lane
North Pole, AK 99705

4. Generator's Phone (907) 488-2741

5. Transporter 1 Company Name

Lynden Transport

6. US EPA ID Number

WAD002799260

7. Transporter 2 Company Name

Totem Ocean Trailer Express

8. US EPA ID Number

WAD070397955

9. Designated Facility Name and Site Address

- ☒ Chempro 734 So. Lucile St. Seattle, WA (206) 762-3362
☐ Chempro 1701 Alexander Tacoma, WA (206) 838-4774
☐ Chempro 20245 76th Ave. South Kent, WA (206) 872-8030
☐ Other:

10. US EPA ID Number

WAD 000812909
WAD 020257945
WAD 991281767

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 907 276-4800

E. State Transporter's ID

F. Transporter's Phone 907 276-5868

G. State Facility's ID

H. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

12. Containers

No.

Type

13. Total
Quantity

14. Unit
Wt/Vol

15. Waste No.

a. X RQ Waste poison B, liquid NOS (D001, D008, ~~D009~~)
(Tetraethyl lead, Tetramethyl lead) poison B UN2810

1

DM

58
KMC

G

D001, D008
W001

b. X RQ Hazardous waste liquid NOS (111 Trichloroethane
ORM-e NA9189 (F001)

1

DM

8

G

F001

c. X RQ Waste Paint (flammable liquid) UN1263 (D001)

1

DM

20

G

D001

d. X RQ Waste paint related material (flammable liquid)
NA1263 (F003, F005, D001)

1

DM

20.55
KMC

G

F003, F005
D001

J. Additional Descriptions for Materials Listed Above

- 11a. Tetraethyl lead contaminated debris
11b. Asphalt cement with Lectra Clean
11c. Waste paint
11d. Waste paint thinner

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

GENERATOR EMERGENCY TELEPHONE 907) 522-1961

☐ CERTIFICATE OF DESTRUCTION/DISPOSAL REQUIRED

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Kathleen McCullom

Signature

Kathleen McCullom

Month Day Year

10/24/91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Michael Fantazzi

Signature

Michael Fantazzi

Month Day Year

10/24/91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Kevin A. McCarthy

Signature

Kevin A. McCarthy

Month Day Year

11/01/91

19. Discrepancy Indication Space

10-28-91 per telephone conversation w/ Tom King okay
to delete X on pg 2 28 b.

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

KATHLEEN F. BALDWIN

Signature

Kathleen F. Baldwin

Month Day Year

11/14/91

ORIGINAL — RETURN TO GENERATOR



MINING AND PETROLEUM TRAINING SERVICE

The University of Alaska Anchorage

CERTIFICATE

This is to certify that

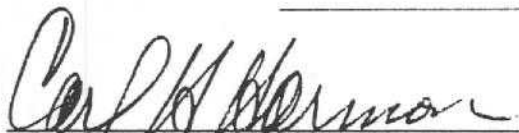
KATHLEEN McCULLOM

has satisfactorily completed

40 Hours

in

HAZARDOUS WASTE OPERATIONS


INSTRUCTOR

August 13-1989

DATE


DIRECTOR



MINING AND PETROLEUM TRAINING SERVICE

The University of Alaska Anchorage

CERTIFICATE

This is to certify that

KATHLEEN McCULLOM

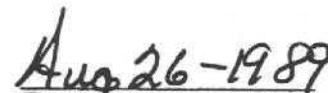
has satisfactorily completed

AN 8 HOUR COURSE

in

Supervisory Hazardous Operations


INSTRUCTOR


DATE


DIRECTOR



America North Inc.

Training Center

Proudly Presents This

Certificate of Completion

KATHLEEN McCULLOM

MAPCO

In recognition of satisfactorily completing
the training requirements for
Hazardous Waste Operations & Emergency Response
8 AAC 10.0101 & 29 CFR 1910.120

GENERAL SITE SUPERVISOR

Awarded on

November 22, 1991

665

Instructor

Manager, Health & Safety

NALCO CHEMICAL COMPANY



CERTIFICATE



This is to certify that

KATHLEEN McCULLUM

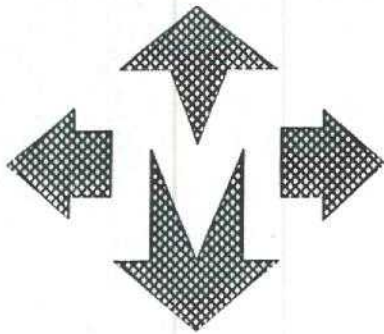
has successfully completed the

HAZARDOUS COMMUNICATION / CHEMICAL HANDLING

this 9th day of NOVEMBER 19 89

Debbie Z. Quinn

Senior Industrial Hygienist



MAPCO ALASKA PETROLEUM Inc.

Certifies That

Kathleen McCullom

Has completed In 1990 87.5 hours

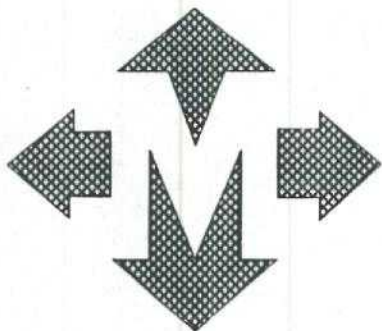
of training specially designed for employees
at the North Pole refinery. Training topics have included:

**Hazard Communication, Oil Spill Response,
Fire Response, and Refinery Safety Procedures.**

F. Johnson
Safety Coordinator

Department Supervisor

K. McCullom
Environmental Coordinator



MAPCO ALASKA PETROLEUM Inc.

Certifies That

Kathleen McCullom

Has completed In 1989, 935 hours

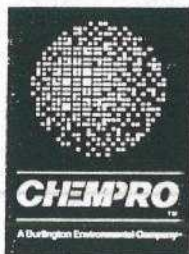
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Department Supervisor

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CHEMICAL PROCESSORS, INC. AND SUBSIDIARIES

CERTIFICATE OF TRAINING

THIS IS TO CERTIFY THAT

Kathleen McCullom

Has successfully completed 8 hours of training

related to the

Land Disposal Restrictions

of

40 CFR Parts 148 and 268

on

October 23, 19 90

Drew E. McCoy

SIGNATURE OR SEAL OF INSTRUCTOR

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Alaska Division

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Methods of Instruction

AND IS HEREBY AWARDED THIS

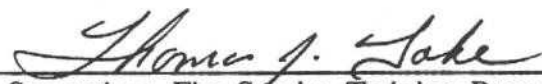
Certificate

IN TESTIMONY WHEREOF:

WE HAVE SUBSCRIBED OUR NAMES THIS 14th DAY OF January A.D. 19 92



Commissioner of Public Safety



Supervisor, Fire Service Training Program

RADIAN
CORPORATION

280-022-01-08

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PROCEDURES AND METHODS
TO ASSURE COMPLIANCE WITH
40 CFR PART 262 REGULATIONS

Prepared For:

MAPCO ALASKA PETROLEUM, INC.
North Pole Refinery

Prepared By:

Radian Corporation
8501 Mo-Pac Blvd.
P.O. Box 201088
Austin, Texas 78720-1088

January 31, 1989

8501 Mo-Pac Blvd./P.O. Box 201088/Austin, TX 78720-1088/(512) 454-4797

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1.0

INTRODUCTION

In accordance with the EPA Region 10 Consent Agreement and Final Order, RCRA Docket No. 1087-12-01-3008(a) this report describes the procedures and methods MAPCO Alaska Petroleum Inc., North Pole, Alaska refinery (MAPI) will follow to assure continued compliance with 40 CFR Part 262 (Standards Applicable to Generators of Hazardous Waste).

This report is structured in the same order as 40 CFR Part 262, Subparts A through D. Section 2 discusses how wastes are characterized. Section 3 describes manifesting and Section 4 describes the pre-transportation activities. Section 5 discusses recordkeeping and reporting.

2.0

GENERAL

2.1

Hazardous Waste Determination

Both hazardous and nonhazardous wastes are generated at MAPI. Potential waste streams include:

- Spent Product,
- Spent Laboratory Reagents,
- NALCO 8960 Maintenance Cleaner,
- Kerosene Maintenance Cleaner,
- Clay Filter Material,
- Used Oil from Refinery Machinery,
- Used Oil from Plant Generators,
- Sump Sludge,
- Exchanger Sludge,
- Tank Bottoms, and
- Spill Clean-up materials (absorbent pads, rags, etc...).

All wastes generated are initially characterized by laboratory analysis or knowledge of process to determine if it is hazardous as defined by 40 CFR 261 Subpart C or D. Each waste stream's characteristics are reviewed annually to ensure the characterization remains current. If a process change occurs that might affect the characterization of a waste stream, the waste stream is recharacterized at that time.

Currently, of the previously listed wastes the following were determined to be classified as hazardous: spent laboratory reagents, some sump sludges, exchanger sludge, some tank bottoms, and some spill clean-up materials. The hydrocarbon-based spent products and used oil from the plant generators are recycled through the refinery processes and are not RCRA regulated according to 40 CFR 261.6 (a)(3)(iii), (v) and (vi). The used oil from refinery machinery is sent to an off-site waste oil burner in Fairbanks, Alaska.

2.2 EPA Identification Number

MAPI applied for and received EPA I.D. Number AKD000850701 in 1987. All transporters and disposers used by MAPI have an EPA I.D. number. Transporters currently used by MAPI and their respective EPA I.D. numbers are as follows:

<u>NAME OF TRANSPORTER</u>	<u>EPA I.D. NO.</u>
Carlile Enterprises	AKD122081243
Alaska Cargo Transport	WAD051251957
Northwest EnviroService, Inc.	WAD058367152
Crosby and Overton, Inc.	WAD991281767

Treatment/Storage/Disposal (TSD) facilities currently used by MAPI and their respective EPA I.D. numbers are:

NAME OF TSD FACILITYEPA I.D. NO.

Northwest EnviroService, Inc.

WAD058367152

Crosby and Overton, Inc.

WAD991281767

3.0 MANIFEST

MAPI generally transports waste in drums by truck to Anchorage, Alaska and then by barge to the TSD facility. No waste shipments are transported by rail. Before any wastes are transported outside of MAPI's North Pole, Alaska refinery, a manifest is prepared by the refinery's Environmental Coordinator. The manifest used is the 9-88 revised EPA form 8700-22 and 8700-22A if necessary. An example manifest is presented in Figure 1.

The manifest is obtained from the state where the waste will be disposed if required by that state. If that state does not supply a manifest, a manifest obtained from the Environmental Protection Agency is used.

Prior to any waste shipments, the Alaska Department of Environmental Conservation (ADEC) is notified a minimum of one day before the waste is shipped with a copy of a completed unsigned manifest. On the day of the shipment the manifest is signed and dated by the refinery's Environmental Coordinator and the initial transporter prior to the shipment leaving the site. One copy of the manifest is kept by the refinery's Environmental Coordinator and the others accompany the shipment. Enough copies of the manifest are available for each of the following to receive a copy: other transporters, the TSD facility, and a final copy for MAPI that is signed by transporters and the TSD facility. The final copy is mailed to MAPI by the TSD facility that receives the waste shipment, in turn MAPI makes a copy of the final manifest and mails it to the ADEC within 45 days of sending the waste off-site. If a manifest is not returned to MAPI within 35 days of sending the waste off-site, MAPI contacts the transporters and the TSD facility to locate the waste shipment.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AKD000850701		Manifest Document No. NPR02		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.					
Generator's Name and Mailing Address MAPCO ALASKA PETROLEUM Inc. 1100 H & H Lane North Pole, AK 99705						A. State Manifest Document Number NA							
4. Generator's Phone (907) 488-2741						B. State Generator's ID NA							
5. Transporter 1 Company Name Carlisle Enterprises				6. US EPA ID Number AKD122081243		C. State Transporter's ID							
7. Transporter 2 Company Name Alaska Cargo Transport				8. US EPA ID Number WAD051251957		D. Transporter's Phone 907-276-7797							
9. Designated Facility Name and Site Address Crosby & Overton Inc. 20245 76th Ave. South, PO Box 1085 Kent, WA 98032				10. US EPA ID Number WAD991281767		E. State Transporter's ID							
						F. Transporter's Phone 907-562-3535							
						G. State Facility's ID							
						H. Facility's Phone 206-872-8030							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit		15. Waste No.	
						No. Type				Wt/Vol			
a. RQ, Hazardous Waste Liquid N.O.S. ORME NA 9189 (K-050)						1 DM		55		G		K050	
b. RQ, Hazardous Waste Liquid N.O.S. ORME NA 9189 (D001)						1 DM		85		G		D001	
c. Hazardous Waste Liquid N.O.S. ORME NA 9189 (F002)						1 DM		15		G		F002	
d. RQ, Waste Combustible Liquid, N.O.S. ORME NA 9189 (F002, D001)						1 DM		40		G		F002, D001	
Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
NA-0562 NA-0563 NA-0570 NA-0571													
15. Special Handling Instructions and Additional Information													
a. RQ 1 pound b. RQ 1 pound c. RQ 1 pound													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Kathleen McCullom Buscovich						Signature <i>Kathleen McCullom</i>				Month Day Year 12/13/88			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Dave Sharpe						Signature <i>Dave Sharpe</i>				Month Day Year 12/13/88			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name Lanette McDonald						Signature <i>Lanette McDonald</i>				Month Day Year 12/16/88			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name RICHARD WADE						Signature <i>Richard Wade</i>				Month Day Year 01/09/89			

Figure 1. Example of Manifest

T9009

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AKD000850701		Manifest Document No. NPR02		2. Page 2 of 2		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address MAPCO ALASKA PETROLEUM Inc. 1100 H & H Lane North Pole, AK 99705						A. State Manifest Document Number							
4. Generator's Phone (907) 488-2741						B. State Generator's ID							
5. Transporter 1 Company Name Transporter 3 Crosby & Overton Inc.						C. State Transporter's ID							
6. US EPA ID Number WAD991281767						D. Transporter's Phone 206-872-8030							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address						G. State Facility ID							
10. US EPA ID Number						H. Facility's Phone							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input type="checkbox"/>													
b. <input type="checkbox"/>													
c. <input type="checkbox"/>													
d. <input type="checkbox"/>													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name						Signature				Month Day Year			
17. Transporter 1 Acknowledgement of Receipt of Materials Transporter 3													
Printed/Typed Name Ronald Diaz						Signature Ronald Diaz				Month Day Year 11/9/89			
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name						Signature				Month Day Year			
19. Discrepancy indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name RICHARD WADZ						Signature Richard Wade				Month Day Year 01/09/89			

Figure 1. Example of Manifest (continued)

4.0 PRE-TRANSPORT REQUIREMENTS

4.1 Packaging

MAPI transports waste in drums. Each container is packaged according to the Department of Transportation regulations found in 49 CFR 173, and 178 as prescribed in 49 CFR 172.101 Hazardous Materials Table.

4.2 Labeling

Each drum or container is labelled in accordance with 49 CFR Part 172 Subpart E before transporting. Each container is labelled according to what is prescribed for the proper shipping name assigned from the Hazardous Material Table located in 49 CFR 172.101. For example, if the waste is assigned the proper shipping name Corrosive Solid, n.o.s., a Corrosive label as described in 49 CFR 172.407 and 172.442 will be affixed to the container.

4.3 Marking

A sticker stating the following is placed on each drum or container of 110 gallons or less when it is placed in storage:

HAZARDOUS WASTE—Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address:

MAPCO Alaska Petroleum Inc.
1100 H&H Lane
North Pole, Alaska 99705
(907)488-2741

Manifest Document Number _____ (NOTE: Is completed on the day of shipment.)

In addition, any marking required by the Department of Transportation regulations found in 49 CFR 172 Subpart D will also be placed on each container. This requires marking each container of 110 gallons or less with the proper shipping name and identification number preceded by either UN or NA assigned to the waste in 49 CFR 172.101 Hazardous Materials Table. All containers containing liquids must be marked with "This Side Up" or "This End Up". Also any waste that is classed as an ORM (Other Regulated Material) must be marked with the appropriate ORM-A through E designation as specified by 49 CFR 172.316.

If the proper shipping name for a mixture does not identify hazardous constituents that make the waste a hazardous substance, the name of the hazardous constituents must also be marked on the drum with the proper shipping name. "RQ" should also be displayed with the shipping name if it contains a hazardous constituent with a reportable quantity.

4.4 Placarding

Generally, the transporter is equipped with the necessary placards required to be placed on the transport vehicle in accordance with 49 CFR 172 Subpart F. However, MAPI also maintains a supply of placards required for the various waste types generated at the North Pole refinery since MAPI is responsible for supplying the transport vehicle with placards if necessary.

4.5 Accumulation Time

MAPI is a small quantity generator who generates greater than 100 kilograms but less than 1,000 kilograms of hazardous waste in a calendar month. Containers that will be disposed at an off-site TSD facility may be stored for up to 270 days provided that no more than 6,000 kilograms of the waste is accumulated at any time. The 270 day time period is effective since there are no off-site TSD facilities within 200 miles of the North Pole, Alaska refinery.

Occasionally , greater than 1,000 kilograms of hazardous waste may be generated in a month (i.e., tank cleaning operations). When this occurs the waste will be stored for less than 90 days before being transported to an off-site TSD facility.

Use and management of the containers are performed in accordance with Subpart I of 40 CFR 265. All drums are compatible with the waste placed in them, if not a compatible liner is placed in the drum before it is filled with the waste. The date upon which the period of waste accumulation begins is clearly marked and visible for inspection on each container. The Hazardous Waste Drum Storage Area is inspected weekly for signs of leaking containers, adequate aisle space, labels and markings, accumulation time, warning signs, and condition of containers by the refinery Environmental Coordinator. Enough aisle space between each drum is maintained so that the inspector can walk around each drum. If a container appears to be in bad condition, the waste is transferred to another container. All containers are kept closed once they are placed in the Drum Storage Area. The Drum Storage Area is a 16 feet by 17 feet curbed cement pad that is surrounded by a fence and a locked gate. The Drum Storage Area is also provided with a closed cement sump for collection of any spills or leaks.

All wastes generated at the refinery are compatible with each other; therefore, no incompatible wastes have ever been stored at the Drum Storage Area. However, if an incompatible waste is ever generated and is required to be stored in the Drum Storage Area it will be separated by a fabricated sand bag wall. Also no incompatible wastes will be placed in the same drum, or in a drum that previously held an incompatible waste and has not been cleaned properly.

Satellite collection areas are located outside the Maintenance Shop and in the Effluent Building. The Maintenance Shop area collects solution from the maintenance parts cleaner bath and the Effluent Building area collects sump sludge. No container greater than 55 gallons is allowed at either of the

satellite collection areas. All containers are closed unless adding or removing waste from the container. The containers are also labelled as "Hazardous Waste". These containers are inspected weekly by the refinery Environmental Coordinator for signs of leaks and to insure that the containers are sealed when not being used. Once the container is filled it is dated and removed to the Hazardous Waste Drum Storage Area.

4.6 Preparedness and Prevention

The Hazardous Waste Drum Storage Area is inspected weekly for signs of spills or leaks. If any contaminants are observed in the sump or on the pad, it will be immediately cleaned and decontaminated. Decontamination procedures may include washing the contaminated pad with an appropriate cleaner or solvent. The decontamination liquids will be collected in the sump and removed to either Lagoon B or placed in a drum for off-site disposal.

A fire monitor is located within 200 feet, and a fire extinguisher is mounted within 30 feet of the Hazardous Waste Drum Storage Area. Safety eye washes and showers are located in the effluent building which is within 200 feet of the Drum Storage Area. The refinery also maintains an alarm system for any major emergency. The Drum Storage Area is equipped with absorbent pads in a 55-gallon drum located adjacent to the site.

Any personnel working at the Drum Storage Area will have access to a two-way radio for communication in case of an emergency.

All emergency equipment discussed previously, are tested and/or inspected monthly to ensure they are in proper working order.

MAPI's internal Emergency Response Plan outlines the callout procedure in case of natural or industrial emergencies. The basic emergency response is to radio the Shift Supervisor who will notify the proper response personnel as required for the specific emergency.

All personnel are informed of emergency notification and response procedures upon initial employment and are reviewed of the procedures in monthly safety meetings. Bright yellow signs stating "In case of an Oil or Hazardous Substance Spill, Call the Shift Supervisor" are posted in the Maintenance, Engineering, Laboratory, Distribution and Operations areas. Evacuation routes are discussed in monthly safety meetings and are presented in the Emergency Response Plan.

MAPI's Safety Coordinator is a member of the local emergency planning commission. MAPI's North Pole refinery has an agreement for mutual aid in fire protection with the City of North Pole, City of Fairbanks, North Star Borough, Fort Wainwright, Eielson Air Force Base, and the local volunteer fire departments. This agreement establishes the policies and procedures whereby participants provide fire fighting, rescue, and wildland fire support, upon request and within capability to each other. Both the North Pole City fire department and the North Star Borough Fire Department participate in fire exercises at the North Pole refinery.

5.0 RECORDKEEPING AND REPORTING

At a minimum, the following records are kept on file by the refinery Environmental Coordinator. These records will be kept longer than the designated time presented if there are any unresolved enforcement actions or it is requested by the EPA Administrator.

<u>DOCUMENT</u>	<u>TIME RETAINED</u>
Initial manifest signed by generator	Until the manifest signed by the TSD facility that received the waste is obtained.

DOCUMENTTIME RETAINED

Manifest signed by the
TSD facility

Three years from the date the TSD facility
accepted the waste.

ADEC Annual Report

Three years from the due date of the
report.

Exception Reports

Three years from the due date of the
report.

Waste Analysis Report

Three years from the date the waste was
last sent to a TSD facility.

An annual report summarizing the hazardous waste activities at the refinery for the previous year is submitted by March 1 of each year to the ADEC. The report format is the same as the EPA Biennial Report Form 8700-13A. The report includes the following:

- EPA I.D. number, name and address of the refinery,
- Calendar year covered by the report,
- EPA I.D. number, name, and address for each off-site TSD facility hazardous waste was shipped to,
- EPA I.D. number and name of each transporter used for shipment of hazardous waste,
- Description and quantity of each hazardous waste shipped off-site,
- Description of efforts undertaken during the year to reduce the volume and toxicity of hazardous waste, and

- Description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years.

Exception reports are filed with the ADEC if MAPI does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated TSD facility within 45 days of the date the waste was accepted by the initial transporter. Exception reports include a legible copy of the manifest signed by the generator and the initial transporter, and a cover letter indicating the efforts MAPI has taken to locate the hazardous waste shipment and the results of the effort.

In addition to the previously mentioned reports, the refinery Environmental Coordinator also maintains inspection records of the Drum Storage Area and Satellite Areas for a minimum of three years from the date of inspection.

6.0 CONCLUSION

The newly built Hazardous Waste Drum Storage Area and the previously described management procedures for storing hazardous waste are now in compliance with 40 CFR Part 262. The previous storage area known as the "Bone Yard" is no longer used for the storage of drummed hazardous waste.

Tank 192 and Sumps 901, 905, 909-B and 05-7 are currently exempt from RCRA, because they are part of the wastewater treatment facility that is subject to Section 307(b) of the Clean Water Act. They also no longer receive any hazardous wastes other than "de minimus" losses from the laboratory or process areas.

MAPI manages the North Pole, Alaska refinery as a small quantity generator and no longer stores more than 6,000 kilograms of hazardous waste at any one

time. Therefore, the North Pole refinery would not be required to obtain a RCRA permit at this time.